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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

T1 PAYMENTS LLC, a Nevada limited liability
company,
Plaintiff,

vs.

NEW U LIFE CORPORATION, a California
corporation,
Defendant.

NEW U LIFE CORPORATION, a California
corporation,
Counterclaimant,

vs.

T1 PAYMENTS LLC, et al.,
Counterclaim-Defendants.

Case No.: 2:19-cv-01816-ART-DJA

**JOINT STIPULATION TO EXTEND
BRIEFING SCHEDULE ON PIXXLES
LTD.'S MOTION TO DISMISS NEW U
LIFE CORP.'S SECOND AMENDED
COUNTERCLAIM [ECF No. 266]
(First Request)**

Specially-appearing counterclaim-defendant Pixxles Ltd. and counterclaimant New U Life stipulate to permit Pixxles Ltd. to file its reply in support of its pending motion to dismiss on or before August 31, 2022. Pixxles Ltd. submits that good cause exists to grant the extension sought by this stipulation for the reasons set forth below.

I. PROCEDURAL BACKGROUND

On August 1, 2022, Pixxles Ltd. filed a timely motion to dismiss New U Life's Second Amended Counterclaim (ECF No. 215, "SACC") for lack of personal jurisdiction and for failure to state a claim pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6). (ECF No. 266.) New U Life filed its opposition to Pixxles Ltd.'s motion to dismiss on August 15, 2022. (ECF No. 270.) Pursuant to LR 7-2(b), the deadline for Pixxles Ltd. to file a reply in support of its motion to dismiss is August 22, 2022. Pixxles Ltd. and New U Life stipulate to extend that response to date to and through August 31, 2022.

II. GOOD CAUSE EXISTS TO EXTEND THE BRIEFING SCHEDULE

Pixxles Ltd. submits that good cause exists to grant a modest extension for Pixxles Ltd. to reply to New U Life's opposition to Pixxles Ltd.'s motion to dismiss from August 22, 2022, to August 31, 2022. This is the first stipulation for extension of time related to this motion. Pixxles Ltd. represents that its lawyers will be traveling over the next two weeks and must also attend to the press of other business.

Pixxles Ltd. submits that its request is not made for the purposes of delay, but rather is in the best interest of the parties and judicial efficiency. In so stipulating, Pixxles Ltd. is not consenting to the personal jurisdiction of this Court or otherwise waiving any rights or defenses.

Accordingly, Pixxles Ltd. requests that the Court modify Pixxles Ltd.'s briefing schedule and permit Pixxles Ltd. to file its reply in support of its motion to dismiss on or before **August 31, 2022**. New U Life has consented to this extension.

(Signatures on following page)

1 Dated this 18th day of August, 2022.

2 McDONALD CARANO, LLP

3
4 By: /s/ Aaron D. Shipley
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17 *Attorneys for New U Life Corporation*

18
19 **IT IS SO ORDERED.**

20 DATED: August 22, 2022

21 
22 _____
23 DANIEL J. ALBREGTS
24 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of McDonald Carano LLP, and that on the 18th day of August, 2022, a true and correct copy of the foregoing **JOINT STIPULATION TO EXTEND BRIEFING SCHEDULE ON PIXXLES LTD.'S MOTION TO DISMISS NEW U LIFE CORP.'S SECOND AMENDED COUNTERCLAIM [ECF No. 266]** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Leah Jennings

An employee of McDonald Carano LLP